

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: SCOTT ALAN GRACE and
TERRI L. GRACE

: NO. 22-10808-ELF

: CHAPTER 13

Response to Motion for Relief filed by Deutsche Bank National Trust Company

Debtors, by and through their attorney, responds as follows:

1-5. Admitted.

6. Denied. Debtors have made additional mortgage payments on August 11, 2022 and August 20, 2022.

7. Denied. Debtors have made two (2) additional mortgage payments since the filing of this Motion.

8-9. Denied. Movant is adequately protected and the real estate is necessary for a successful reorganization.

WHEREFORE, it is respectfully requested that the Motion be DENIED.

By: /S/Michael P. Kelly